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7 *Attorneys for Google LLC*

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 GOOGLE LLC,

12 Plaintiff,

13 vs.

14 SONOS, INC.,

15 Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN  
SUPPORT OF SONOS, INC.'S  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
SEALED (DKT. NO. 288)**

1 I, Jocelyn Ma, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing  
4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this  
5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Sonos, Inc.’s (“Sonos”) Administrative Motion to  
7 Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) (Dkt. No.  
8 288) filed in connection with Sonos and Google’s Joint Discovery Letter Brief (“Discovery Letter”)  
9 (Dkt. No. 287). If called as a witness, I could and would testify competently to the information  
10 contained herein.

11 3. Google seeks an order sealing the materials as listed below:

12 Document	13 Portions Sonos Sought to Be Filed Under Seal	14 Portions Google Seeks to Be Filed Under Seal	15 Designating Party
16 Discovery Letter	17 Portions Highlighted in Yellow	18 Portions Highlighted in Yellow	19 Google

20 4. I understand that the Court analyzes sealing requests in connection with discovery  
21 motions pursuant to a “good cause” standard. *See Intel Corp. v. Tela Innovations, Inc.*, No. 3:18-CV-  
22 02848-WHO, 2018 WL 4501146, at \*3 (N.D. Cal. Sept. 18, 2018). I also understand that courts have  
23 found materials which detail “sensitive financial and business information” are appropriately sealed  
24 under this standard. *Skillz Platform Inc. v. AviaGames Inc.*, No. 21-CV-02436-BLF, 2022 WL  
25 875654, at \*2 (N.D. Cal. Mar. 24, 2022). I further understand that courts have granted motions to seal  
26 a company’s “sensitive information about [its] data, processes, systems, and policies.” *Free Range*  
27 *Content, Inc. v. Google Inc.*, No. 14-cv-02329-BLF, Dkt. No. 192, at 3-9 (N.D. Cal. May 3, 2017); *see*  
28 *also Trotsky v. Travelers Indem. Co.*, 2013 WL 12116153, at \*8 (W.D. Wash. May 8, 2013) (granting  
motion to seal as to “internal research results that disclose statistical coding that is not publically [*sic*]  
available”).

5. The portions of the Discovery Letter highlighted in yellow contain confidential  
information regarding Google’s highly sensitive product usage metrics data, as well as the internal

1 processes, databases, and systems for obtaining and maintaining that data, which Google does not  
2 share publicly. Public disclosure of this information could harm Google's competitive standing and  
3 create a risk of injury by providing competitors with access to information that Google does not have  
4 similar access to about their competitors, and may expose Google to increased security risk and allow  
5 competitors and/or bad actors to manipulate or gain insight into how Google maintains its data. Thus,  
6 Google has good cause to keep such information under seal. A less restrictive alternative than sealing  
7 the highlighted portions would not be sufficient because the information sought to be sealed is  
8 Google's confidential and highly sensitive financial information but has been utilized by Sonos and  
9 Google in the Discovery Letter.

10 I declare under penalty of perjury under the laws of the United States of America that to the  
11 best of my knowledge the foregoing is true and correct. Executed on June 21, 2022, in San Francisco,  
12 California.

13 DATED: June 21, 2022

14 By: /s/ Jocelyn Ma  
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